

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS AND ST. JOHN**

UNITED STATES OF AMERICA,

3:19-cr-79

v.

KAI JAMES,

Defendant

_____ /

MOTION FOR NOTICE OF UNITED STATES' INTENT TO USE EVIDENCE

COMES NOW, Defendant pursuant to *Fed. R. Crim. P. 12(b)(4)(B)* demand that the United States provide notice of the United States' intent to use (in its evidence-in-chief at trial) any evidence that the Defendant may be entitled to discover. This request is made in furtherance of Defendant's right to Rule 16 discovery and in order to have an opportunity to move to suppress evidence prior to trial in this matter.

DATED: April 8, 2020

Respectfully submitted,

/s/Darren John-Baptiste
Attorney for the Defendant
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 8, 2020, an exact copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which will send a notification of the filing (NEF) to the parties in the above captioned action

/s/ Darren John-Baptiste